



San Bernardino Associated Governments

*San Bernardino County Transportation Commission
San Bernardino County Transportation Authority
San Bernardino County Congestion Management Agency
Service Authority for Freeway Emergencies*

472 North Arrowhead Avenue, San Bernardino, California 92401-1421
(909) 884-8276 FAX: (909) 885-4407

July 3, 2002

Ms. Magalle Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

RECEIVED & INSPECTED
JUL 16 2002
FCC - MAILROOM

RE: Docket #01-108

Dear Ms. Roman Salas:

Since the official public comment period regarding the AT&T issue has lapsed, the San Bernardino Service Authority for Freeways and Expressways (SAFE) requests that you review the attached letter as an ex parte document.

We graciously request that the information contained in the attached letter be considered by the FCC at the time that a decision is being rendered.

If you have any questions, please contact me at (909) 884-8276.

Sincerely,

A handwritten signature in dark ink, appearing to read "Norman R. King".

Norman R. King
Executive Director
San Bernardino County
Service Authority for Freeways and Expressways

Attachment – July 2, 2002 Letter

cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer
San Bernardino County Congressional Delegation
Linda Chang, Wireless Telecommunications Bureau, FCC
Blaze Scinto, Deputy Division Chief, Policy Division, FCC
D'Wana Perry, Private Wireless & Public Safety Division, FCC

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A handwritten signature in dark ink, appearing to be a stylized "P" or similar character.

*Cities of: Adelanto, Barstow, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma Linda, Montclair
Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentynine Palms, Upland, Victorville, Yucaipa
Towns of: Apple Valley, Yucca Valley County of San Bernardino*



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July 3, 2002

William F. Caton, Acting Secretary
Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Washington, DC 20554

Dear Mr. Caton:

This letter is in response to recent revelations that AT&T Wireless is lobbying the Federal Communications Commission (FCC) to obtain relief from Part 22 of the FCC rules requiring cellular radiotelephone service providers to provide analog cellular service. The San Bernardino County Service Authority for Freeways and Expressways (SAFE) respectfully requests that the FCC not grant relief to AT&T Wireless and/or other cellular radiotelephone service providers from the aforementioned requirement.

The San Bernardino SAFE is a local governmental authority responsible for providing motorist aid services within San Bernardino County, California. San Bernardino SAFE currently operates a system of over 1,683 call boxes installed on over 1,650 miles of freeways and state highways in San Bernardino County. All of the call boxes use analog cellular service, provided by AT&T Wireless, to provide a means of communication between stranded motorists in a hazardous situations and a call answering dispatching center. The call box system was initially installed in San Bernardino County in the early 1990's and the system was designed and continues to utilize analog cellular service. The system provides a lifeline that is used by over 60,000 motorists annually to report incidents and request assistance. As a local agency with limited financial capacity and resources, San Bernardino SAFE has to diligently manage its public funds. Any relief provided by the FCC regarding the continued provision of analog cellular service will have a direct and immediate negative impact on the ability of San Bernardino SAFE to reliably operate the call box system and thereby endanger the motorists of San Bernardino County.

San Bernardino SAFE estimates that the cost to modify the call box system to operate using digital technology to be upwards of \$2.6 million. This cost is two times the amount of revenue that the San Bernardino SAFE receives in one year, and is two times the amount that it takes to maintain the system during one year. Given the amount of miles that call boxes cover our county roads, and the low amount of revenue that the program generates each year, the cost to convert these services is tremendous and would impact our ability to provide these services.

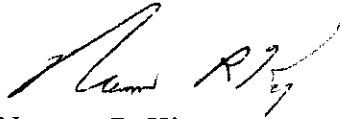
San Bernardino county covers 20,160 square miles and is the largest county in the nation. Approximately 90% of the county has a desert-like terrain, and is in rural areas. However, the corridors of highways that motorists use to travel in and out of the county also travel in desert/desolate areas and the call boxes are at times the only assistance available to motorist should there be an emergency. Call boxes are a life-line for motorists traveling through the rural/desert portions of our county. Therefore, we have concerns about this issue and that should AT&T be allowed to no longer provide analog cellular service in this county, that the call box network would be suspended and no longer offered to motorists.

*Cities of: Adelanto, Barstow, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma Linda, Montclair
Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentynine Palms, Upland, Victorville, Yucaipa
Towns of: Apple Valley, Yucca Valley County of San Bernardino*

While San Bernardino SAFE is not opposed to the desires of AT&T Wireless and the cellular industry to migrate from an analog to a digital based cellular system; San Bernardino SAFE does oppose any rulings or relief that would benefit AT&T Wireless and/or other cellular radiotelephone service providers and would result in negative financial, safety and service impacts to the public. Therefore, San Bernardino SAFE proposes that, at a minimum the FCC mandate that AT&T Wireless enter into a partnership with the San Bernardino SAFEs to mitigate any and all financial, technological and other barriers that San Bernardino SAFE is faced with and develop a transition plan that will be beneficial to all parties. As a final point of information, the San Bernardino SAFE is the 3rd largest single county call box authority in the State of California and there are an additional 16 authorities in California alone, which operate over 10,000 additional call boxes that would be adversely affected if the cellular radiotelephone service providers were to be granted relief from Part 22 of the FCC rules.

I thank you for the opportunity to inform the FCC of our concerns. Please contact Michelle Kirkhoff of SAFE staff at (909) 884-8276 for further information about the impact that this would have on our program.

Sincerely yours,



Norman R. King
Executive Director
San Bernardino County
Service Authority for Freeway Emergencies

cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer
San Bernardino County Congressional Delegation